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Subject: EPA response to May 5, 2010 LWG letter re: PRGs for the Portland Harbor FS
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Bob & Jim

EPA has reviewed the Lower Willamette Group's (LWG) May 5, 2010 letter regarding EPA's April 21, 2010 comments on PRGs for the Portland Harbor Feasibility Study (FS). EPA notes that that LWG had no further response to EPA's comments except for EPA's comment on inclusion of level 2 and level 3 effects for all four sediment toxicity endpoints.

EPA acknowledges that the LWG disagrees on a technical basis that Level 2 endpoints or the Hyalella biomass Level 2 or 3 endpoints reliably represent toxicity in study area sediments. In the interest of moving the FS forward, however, the LWG has agreed to use EPA's July 2009 reference envelope values, as previously directed, in the screening of alternatives for the FS and that the LWG will provide additional technical analysis regarding the use of the Level 2 endpoints and the Hyalella biomass endpoint at the time of the screening of alternatives check-in.

EPA agrees that proceeding with the FS screening of alternatives based on our previous direction is the best path forward to avoid delays in getting the FS started. However, as noted in the LWG's letter, EPA's review and comment on methods to assess risks to the benthic community are still underway. EPA expects that these comments will also inform the weight given the Level 2 endpoints and the Hyalella biomass Level 2 or 3 endpoints.

Please let us know if you have any questions.

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